

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION

CHARLES BERNSTEIN, JR.,  
INDIVIDUALLY AND ON BEHALF OF  
ALL OTHERS SIMILARLY SITUATED,

VS.

BUCKEYE, INC.

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CIVIL NO. 7:18-cv-00097-DC

**PLAINTIFFS' VOIR DIRE QUESTIONS**

1. Do you know Chan Price or any other employee of Buckeye, Inc.

If YES, please describe your relationship and if that relationship would affect your ability to serve as a fair juror.

2. Have you, your spouse or close family members ever owned or managed a business with 10 or more employees?

If YES, who and what kind of business?

If YES, was that business ever sued?

If YES, please describe (include outcome):

3. Which group do you identify with most (SHOW OF HANDS)?

- Executives
- Managers
- Workers

4. Have you, a close friend or family member ever worked in the legal field?

If YES, please explain:

5. Have you ever worked in the oil field?

If YES, please give the positions worked and how you were compensated (hourly/salary/day rate)

6. Do you have any experience with establishing pay practices for an employer?

If YES, please explain your role in setting how employees were paid and whether the company was ever sued for violating the Fair Labor Standards Act.

7. Have you, a close friend, or a family member ever filed a grievance or complaint against an employer?

If YES, please describe the grievance or complaint and how it was resolved.

8. What is your opinion regarding the following statement: “Too many baseless lawsuits are seriously hampering business and the economy.”

SHOW OF HANDS:

- Strongly agree
- Agree
- Disagree
- Strongly disagree

9. What is your opinion regarding the following statement: “There should be laws making it more difficult to file lawsuits against businesses.”

SHOW OF HANDS

- Strongly agree
- Agree
- No opinion
- Disagree

- Strongly disagree

10. What is your opinion regarding the following statement: “There is too much regulation of businesses and it makes it difficult to run a business effectively.”

SHOW OF HANDS

- Strongly Agree
- Agree
- Disagree
- Strongly Disagree

11. Can you think of any reason you might not treat both sides of this case 100% equally? If so, please explain.

12. Do you have any training or experience that relates to the subjects that are involved in this case? If not, is there any reason you might not be 100% confident that you will understand it completely? Explain.

13. Is there any reason why you think you might not be a good juror for this case?

Respectfully submitted,

/s/ William S. Hommel, Jr.

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on September 17, 2020.

/s/ William S. Hommel, Jr.  
William S. Hommel, Jr.